

EXHIBIT G

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d/b/a USA Medical Supply*

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

<p>NEW YORK MICROSCOPE COMPANY, INC.,</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p>v.</p> <p>BYERS HOLDING GROUP LLC, and USA CAPITAL FUND, LLC d/b/a USA MEDICAL SUPPLY,</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p>Case No: 23-cv-03718</p> <p>DEFENDANT USA CAPITAL FUND'S RESPONSES TO FIRST REQUEST FOR DOCUMENTS SERVED BY PLAINTIFF NYMC</p>
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TO: Thomas J. McGowan, Esquire
Kimberly A. Ahrens, Esquire
MELTZER, LIPPE, GOLDSTEIN & BREITSTONE, LLP
190 Willis Avenue
Mineola, New York 11501
Attorneys for Plaintiff, New York Microscope Company, Inc.

Defendant, USA Capital Fund, LLC d/b/a USA Medical Supply ("USA Capital") hereby objects and responds to the First Request for Production of Documents served by plaintiff New York Microscope Company, Inc. ("NYMC") in accordance with the Federal and Local Rules.

Dated: April 18, 2025

THE MILUN LAW FIRM, LLC

By: s/ Susan Ferreira
SUSAN FERREIRA

RESPONSE TO NYMC'S REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Documents and communications between USA Medical and Plaintiff relating to (1) the Action; (2) the Contract; (3) HIS; and (4) commission payments to plaintiff.

RESPONSE: See responsive documents attached hereto.

2. Communications between USA Medical and Byers relating to (1) the Action; (2) the Contract; (3) HIS; and (4) commission payments to Plaintiff.

RESPONSE: See responsive documents attached hereto.

3. Documents and communications relating to the Contract between USA Medical and:
 - a. Ossnat Koenig
 - b. Zachary Byers
 - c. John Rhoden
 - d. Amber McQuerry
 - e. Steve Luk
 - f. Edwin Byers
 - g. Eli Rouimi
 - h. Andy Fink
 - i. Revital Louk
 - j. Counsel for Byers

RESPONSE: See responsive documents attached hereto.

4. Documents and communications relating to any agreement between USA Medical and Byers.

RESPONSE: See responsive documents attached hereto.

5. Documents and communications relating to commission payments owed to Plaintiff.

RESPONSE: See responsive documents attached hereto.

6. Documents and communications between USA Medical and Byers relating to the purchase and sale of PPE, including invoices, receipts, and proofs of payment.

RESPONSE: See responsive documents attached hereto.

7. Documents and communications between USA Medical and IHS relating to the purchase and sale of PPE, including invoices, receipts, and proofs of payment.

RESPONSE: See responsive documents attached hereto.

8. Documents and communications relating to any payments sent from IHS to USA Medical, directly or through Byers, for the purchase of PPE, including invoices, receipts, and proofs of payment.

RESPONSE: See responsive documents attached hereto.

9. Communications between USA Medical and any third party relating to (a) the Action; (b) the Contract; (c) the sale of PPE equipment to HIS; and (4) commission payments to Plaintiff.

RESPONSE: See responsive documents attached hereto.

10. Documents and communications between USA Medical and Plaintiff, Byers, and/or any third party relating to the claims in the Complaint.

RESPONSE: See responsive documents attached hereto.

11. Documents and communications between Byers and any government entity or representative relating to (1) the Contract; and (2) the sale of PPE to IHS.

RESPONSE: USA Capital does not possess any documents responsive to this request.

12. Documents and communications relating to the USA Medical invoice for \$815,743.38, as alleged in paragraph 7 of the USA Medical Counterclaim.

RESPONSE: See responsive documents attached hereto.

13. Documents and communications evidencing USA Medical's contention that "USA Medical was an intended beneficiary of the Byers/NYMC contract", as alleged in paragraph 6 of the USA Medical Counterclaim.

RESPONSE: See responsive documents attached hereto.

14. Documents and communications relating to all damages claimed by USA Medical in the USA Medical Counterclaim.

RESPONSE: See responsive documents attached hereto.

15. Documents and communications relating to any settlement entered into by USA Medical relating to the allegations in the Complaint and/or the USA Medical Counterclaim.

RESPONSE: See responsive documents attached hereto.

16. Documents and communications relating to any common interest and/or joint defense agreement entered into between USA Medical and Byers relating to the allegations in the Complaint and/or the USA Medical Counterclaim.

RESPONSE: Upon the advice of counsel, USA Capital objects to this request as it seeks information which is protected by the attorney-client privilege and/or attorney work product privilege. In addition, this request seeks information which is not relevant to the claims or defenses in this case which is not reasonably calculated to lead to discovery of admissible evidence.

17. The email from Steve Luk to Zack Byers dated February 24, 2022 that is referenced in the text message from Zack Byers to Ossnat Koenig dated February 24, 2022 (*see* Plaintiff's document production, Plaintiff_00047).

RESPONSE: See responsive documents attached hereto.

CERTIFICATION

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

I hereby certify that the copies of the reports annexed hereto provided by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

Dated: May 6th, 2025

By: Eli Rouimi
(signature)

Eli Rouimi, CEO as managing member
(printed name)